

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

HUDSON FURNITURE, INC., and
BARLAS BAYLAR

Plaintiffs,

v.

ALAN MIZRAHI d/b/a ALAN MIZRAHI LIGHTING,
and LIGHTING DESIGN WHOLESALERS INC.,

Defendants.

7/2/2020

The Court cannot sign the papers in the present form. Plaintiffs must comply with the requirements set forth in the Federal Rules of Civil Procedure, including, *inter alia*, providing notice to the opposing party.

SO ORDERED.



Case No. 20-cv-04891

**PLAINTIFFS' NOTICE OF MOTION
FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that upon the Declaration of Patrick J. Hines, sworn to the 25th day of June, 2020, and the exhibits annexed thereto, Declaration of Barlas Baylar, sworn to the 24th day of June, 2020, and the exhibits annexed thereto, and the accompanying memorandum of law, and the entire record herein, Plaintiffs hereby move the Court for entry of an Order pursuant to (i) 17 U.S.C. §§ 501 *et seq.* (the "Copyright Act"), specifically 17 U.S.C. § 502; (ii) the Trademark Act of 1946, § 15 U.S.C. §§ 1051 *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the "Lanham Act"), specifically 15 U.S.C. § 1116; (iii) 35 U.S.C. § 283; (iv) Federal Rule of Procedure 65; (v) 28 U.S.C. § 1651 (the "All Writs Act"); and/or the inherent equitable powers of this Court, (1) preliminarily enjoining Defendants from further acts of infringement of Plaintiffs' copyrights, trademarks, and design patents, (2) enjoining Defendants and their

financial service providers from fraudulently transferring assets, and (3) relieving Plaintiffs of the obligation to post bond prior to issuance of a preliminary injunction.

A Proposed Order is attached hereto.

Dated: June 25, 2020

HODGSON RUSS LLP

*Attorneys for Hudson Furniture, Inc. and
Barlas Baylar*

By: /s/ Patrick J. Hines

Patrick J. Hines

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